

Dear Dr. Stokes:

I am writing to strongly endorse the idea that NIEHS should adopt the new non-animal test methods without delay. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of delays associated with routine regulatory implementation hurdles.

As I understand it, NIEHS recommends using the non-animal method to set the starting dose for further animal-poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agencies should use in vitro cell culture tests to replace entirely the use of animals in lethal dose tests.

At the very least, I believe that all government agencies that currently require the acute animal-poisoning studies should immediately incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual replacement for lethal-dose poisoning studies. In particular, I believe that the EPA should immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community (please see: <http://www.peta-online.org/news/99/1099hpvvict.html> )

Finally, if you have not done so already, I recommend that you read Dr. Pietro Croce's "Vivisection or Science?", available via traditional bookstore purchase and at amazon.com. Other books, such as the recently- published "Sacred Cows, Golden Geese" by Drs. Ray and Jean Greek, addressing the scientific invalidity and huge amount of financial and opportunity cost-related waste related to animal testing are also available. I encourage you to read as many such works as you can if you have not done so already.

Thank you for your time and attention.

Sincerely yours,

Matt Campbell